

PATRICK H. HICKS, ESQ., Bar # 4632
AMY L. THOMPSON, ESQ., Bar # 11907
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
Emails: phicks@littler.com
athompson@littler.com

Attorneys for Plaintiff
AHERN RENTALS, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AHERN RENTALS, INC.,
Plaintiff,

vs.

KEITH WADE, an individual; JESSIE
WADE, an individual;
EQUIPMENTSHARE.COM, INC.; DOES
I-X, inclusive; and ROES I-X, inclusive,
Defendants.

Case No.: 2:20-cv-00094-JAD-VCF

**STIPULATION AND
ORDER FOR PRELIMINARY
INJUNCTION**

ECF Nos. 10, 15

Plaintiff, Ahern Rentals, Inc. ("Ahern"), and Defendants Keith Wade, Jessie Wade, and EquipmentShare.com, Inc. ("EquipmentShare"), by and through their undersigned counsel, and without admission, waiver, or acknowledgment of any claim, defense, or allegation by any party, and solely for the purpose of maintaining the status quo by mutual agreement of the parties, enter into the following stipulated preliminary injunction:

1. Keith Wade and Jessie Wade shall abide by the non-solicitation and confidentiality obligations of their Employment Agreements with Ahern until a final adjudication on the merits;

1 2. EquipmentShare shall not direct or encourage the Wades to solicit Ahern employees
2 and shall not direct or encourage the Wades to utilize any confidential or proprietary information of
3 Ahern for the benefit of EquipmentShare, or to provide any such confidential information to
4 EquipmentShare, to the extent the Wades are in possession of, or have access to, such confidential
5 information, with such injunctive relief set forth in this paragraph lasting until a final adjudication on
6 the merits;

7 3. Keith Wade and Jessie Wade shall turn over to Ahern, and cease any use of, Ahern's
8 confidential information, to the extent they are in possession of, or have access to, such confidential
9 information and, to the extent Keith Wade or Jessie Wade have provided any such confidential
10 information to EquipmentShare, EquipmentShare shall turn over to Ahern, and cease use of, that
11 information.

12 4. Defendants shall preserve any and all paper and electronic data or information having
13 any relevance or potential relevance to the allegations in or potential defenses to the allegations in the
14 Complaint; and

15 ///

16
17 ///

18
19
20 ///

21
22
23 ///

24
25
26 ///

